



LAW OFFICES  
LIMITED LIABILITY PARTNERSHIP

LOS ANGELES, CA  
SAN FRANCISCO, CA  
WILMINGTON, DE  
NEW YORK, NY  
HOUSTON, TX

10100 SANTA MONICA BLVD.  
13th FLOOR  
LOS ANGELES  
CALIFORNIA 90067-4003

TELEPHONE: 310.277.6910  
FACSIMILE: 310.201.0760

SAN FRANCISCO  
150 CALIFORNIA STREET  
15th FLOOR  
SAN FRANCISCO  
CALIFORNIA 94111-4500

TELEPHONE: 415.263.7000  
FACSIMILE: 415.263.7010

DELAWARE  
919 NORTH MARKET STREET  
17th FLOOR  
P.O. BOX 8705  
WILMINGTON  
DELAWARE 19899-8705

TELEPHONE: 302.652.4100  
FACSIMILE: 302.652.4400

NEW YORK  
780 THIRD AVENUE  
34th FLOOR  
NEW YORK  
NEW YORK 10017-2024

TELEPHONE: 212.561.7700  
FACSIMILE: 212.561.7777

TEXAS  
440 LOUISIANA STREET  
SUITE 900  
HOUSTON  
TEXAS 77002-1062

TELEPHONE: 713.691.9385  
FACSIMILE: 713.691.9407

Jeffrey P. Nolan

March 21, 2023

310.772.2313  
jnolan@pszjlaw.com

The Honorable Alan S. Trust  
United States Bankruptcy Court Eastern  
District of New York  
Alfonse M. D'Amato Federal  
Courthouse 290 Federal Plaza  
Central Islip, New York 11722

**Re: Howard M. Ehrenberg v. Arvind Walia, et al**  
**Adv. Proc. No. 20-08049-AST**

Dear Judge Trust:

Plaintiff, Howard Ehrenberg, as the duly appointed Trustee, and Plaintiff in the above referenced adversary proceeding, hereby informs the court that all briefing with respect to the Motions for Summary Judgment has been completed. Below is a list of all relevant pleadings and respective docket numbers related to the Motions for Summary Judgment.

1. *Stipulation for Scheduling Order re: Briefing Schedule for Summary Judgment Motions and Order Thereon* [Docket No. 49].
2. *Motion of Defendants Arvind Walia and Niknim Management Inc. For Partial Summary Judgment Dismissing Claims Asserted in the Complaint Under 11 U.S.C. § 544* [Docket No. 51].
3. *Notice of Defendants' Motion For Partial Summary Judgment Dismissing Claims Asserted in the Complaint Under 11 U.S.C. § 544* [Docket No. 52].
4. *Plaintiff's Notice and Motion for Summary Judgment, or in the Alternative, Summary Adjudication as Against Defendants Arvind Walia and Niknim Management, Inc.* [Docket No. 53].
5. *Joint Statement of Uncontroverted Facts in Support of Plaintiff's Motion for Summary Judgment or, in the*



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*Alternative, Summary Adjudication; Plaintiff's Additional Statement of Facts* [Docket No. 54].

6. *Affidavit of Jeffrey P. Nolan in Support of Motion for Summary Judgment, or in the Alternative, Summary Adjudication as Against Defendants Arvind Walia and Niknim Management, Inc.* [Docket No. 55].
7. *Affidavit of Edith Wong in Support of Motion for Summary Judgment, or in the Alternative, Summary Adjudication as Against Defendants Arvind Walia and Niknim Management, Inc.* [Docket No. 56].
8. *Affidavit of Frank A. Lazzara in Support of Motion for Summary Judgment, or in the Alternative, Summary Adjudication* [Docket No. 57].
9. *Request for Judicial Notice in Support of Plaintiff's Motion for Summary Judgment, or in the Alternative, Summary Adjudication as Against Defendants Arvind Walia and Niknim Management, Inc.* [Docket No. 58].
10. *Opposition to Motion of Defendants Arvind Walia and Niknim Management Inc. for Partial Summary Judgment Dismissing Claims Asserted in the Complaint Under 11 U.S.C. §544* [Docket No. 60].
11. *Plaintiff's Response to Defendants' Separate Statement of Facts and Plaintiff's Additional Facts in Opposition to Defendants' Motion for Summary Judgment or, in the Alternative, Summary Adjudication* [Docket No. 61].
12. *Affidavit of Jeffrey P. Nolan in Support of Opposition to Motion of Defendants Arvind Walia and Niknim Management, Inc. for Partial Summary Judgment Dismissing Claims Asserted in the Complaint Under 11 U.S.C. §544* [Docket No. 62].
13. *Affidavit of Arvind Walia in Opposition to Plaintiff's Motion for Summary Judgment* [Docket No. 64] (**refiled at Docket No. 67**).
14. *Brief of Defendants in Opposition to Motion for Summary Judgment* [Docket No. 65] (**refiled at Docket No. 68**).



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15. *Affirmation of Sanford P. Rosen in Opposition to Motion for Summary Judgment* [Docket No. 66] **(refiled at Docket No. 69).**
16. *Reply of Defendants Arvind Walia and Niknim Management Inc. in Support of Motion For Partial Summary Judgment Dismissing Certain Claims Asserted in the Complaint* [Docket No. 70].
17. *Objection and Request to Strike the Affidavit of Arvind Walia Submitted in Opposition to Plaintiff's Motion for Summary Judgment, or in the Alternative, Summary Adjudication* [Docket No. 71].
18. *Reply Brief in Support of Motion for Summary Judgment, or in the Alternative, Summary Adjudication as Against Defendants Arvind Walia and Niknim Management, Inc.* [Docket No. 72].
19. *Affidavit of Jeffrey P. Nolan in Support of Plaintiff's Motion for Summary Judgment, or in the Alternative, Summary Adjudication* [Docket No. 73].

Very truly yours,

/s/ Jeffrey P. Nolan

Jeffrey P. Nolan

JPN:lsc

cc: (Counsel for Defendants, via ECF and email)